

MEMO ENDORSED

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February 12, 2024

BY ECF

Hon. Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Robert Birch, 23 CR 563 (LAK) (SDNY)

Dear Judge Kaplan:

I am writing on behalf of defendant Robert Birch to respectfully request a modification of the defendant's bail conditions which would permit him to travel to Montvale, New Jersey for a medical appointment on February 27, 2024, the details of which have been provided to both the government and Pretrial Services. Intensive Supervision Specialist Jonathan Lettieri from Pretrial Services has no objection to this request and the government defers to the position of Pretrial Services.

By way of background, on November 2, 2023, Mr. Birch was released on a \$500,000 personal recognizance bond signed by two financial responsible persons by Judge Gary Stein with conditions, *inter alia*, that Mr. Birch's travel be restricted to the Southern and Eastern Districts of New York. Since that time, Mr. Birch has remained compliant with the conditions of his release.

JEFFREY LICHTMAN

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Thank you for the Court's consideration of this application. I remain available for a conference should Your Honor deem it necessary.

Respectfully submitted,



Jeffrey Lichtman

cc: Jamie Bagliebter, Esq.
Elizabeth Espinosa, Esq.
Assistant United States Attorneys (by ECF)

Jonathan Lettieri
Pretrial Services Officers (by email)

So Ordered:



Hon. Lewis A. Kaplan, U.S.D.J.

Dated: 2/13/2024